

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Assessment and Collection of Regulatory)	MD Docket No. 19-105
Fees for Fiscal Year 2019)	
)	

COMMENTS OF MENTOR PARTNERS, INC.

Mentor Partners, Inc. (“Mentor”) hereby submits comments with the Federal Communications Commission’s (“Commission”) on proposed regulatory fees for fiscal year (FY) 2019.¹

Mentor is a family owner and operator of several FM and AM licenses in the Big Rapids, Michigan area. Through a focused approach to community engagement as well as local news and sports coverage, Mentor provides an important public service to the its community of license and the surrounding area utilizing numerous translators that ensure full service to the community.

¹ Assessment and Collection of Regulatory Fees for Fiscal Year 2019, Notice of Proposed Rulemaking, MD Docket No. 19-105, FCC 19-37 (Oct. 24, 2018) (NPRM).

Mentor appreciates the Commission's need to appropriately collect regulatory fees annually, and that the Commission faces a \$17 million budget increase for FY 2019.² We urge the Commission to carefully consider the burdens that annual regulatory fees place on small business broadcasters like Mentor who strive to serve their communities in an increasingly competitive media advertising environment.

Mentor also has concern that the Commission would have radio broadcasters bear the bulk of fee increases to cover this increase, with the radio broadcasting industry facing fee increases of 20 percent.³ Facing such fee increases, Mentor seeks to understand why the radio broadcasting industry should face this increase when other segments face a far smaller increase on their fees – for example, the Commission only proposes a fee increase percentage of 11.7 percent for Cable TV Systems.⁴ The NPRM does not include a rationale for this disparity in percentage increases between segments, leaving Mentor unable to analyze and respond to the Commission's rationale for it. Similarly, the NPRM omits any explanation of its methodology for the calculation and allocation of full time employees for radio broadcasters.

Mentor therefore requests that the Commission provide its rationale for proposing that radio broadcasters bear the largest burden in FY2019 annual regulatory fee increases, and accept further public comment on that rationale, before the fees are finalized. Ultimately, the Commission must alter its approach to its annual fee increases to provide for equal distribution of burden across industry segments.

² *Id.* at ¶ 1.

³ NPRM at Appendix Bat 26.

⁴ *Id.*

Mentor appreciates the opportunity to provide its input to the Commission on this important matter and urges the Commission to proceed consistent with our views above.

/Jeff Scarpelli/

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Mentor Partners, Inc.

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